

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

V.

STEFAN HRVATIN,

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CRIMINAL NO. 4:22-CR-00612(5)

UNOPPOSED
MOTION TO MODIFY BOND CONDITIONS

TO THE HONORABLE ANDREW S. HANEN, U.S. DISTRICT JUDGE

Stefan Hrvatin, Defendant, asks the Court to modify his bond conditions and would show this Court the following:

1. Steven Hrvatin was released after posting bond on December 15, 2022, in the United State Magistrate's Court for the Southern District of Florida in Cause No. 22-MJ-04106. He remains on supervision by the United States Probation Office in that district.

2. He is participating in the GPS location monitoring program, and home detention is a condition of his release.

3. No other defendant is restricted to home detention. "Stand alone monitoring" is the standard for all the other co-defendants, allowing them to move about within the judicial district where they are on supervision by GPS monitoring.

4. Counsel has conferred with AUSA Thomas Haywood Carter. The government is not asking that Mr. Hrvatin be restricted to home detention.

5. The District Court, by Order entered on December 16, 2022, document #40, directed that “any modifications to the conditions of release should be in parity with others similarly situated.”

6. If Hrvatin is placed on “stand alone monitoring,” with continued GPS monitoring, he will be “in parity” with his co-defendants.” He will remain restricted to the Southern District of Florida except to attend court or visit his attorney in Houston, Texas, with prior notice to the U.S. Probation Office.

7. The government is not opposed to the modification of his conditions of release presented in the attached proposed order.

Respectfully submitted,

/s/ Edward Mallett
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ATTORNEY FOR DEFENDANT
STEFAN HRVATIN

CERTIFICATE OF CONFERENCE

On the 12th day of January, 2023, Defendant's counsel conferred with Assistant United States Attorney Thomas Haywood Carter and he is unopposed to the granting of this motion, and allowing "stand alone supervision" with continued GPS monitoring.

/s/ Edward Mallett
Edward Mallett

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing notice has been furnished to the Assistant U.S. Attorneys assigned to this case and for counsel for all co-defendants via the Court's ECF system on the 12th day of January, 2023.

/s/ Edward Mallett
Edward Mallett